

UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

JULIA REANDO,)	
Plaintiff,)	
)	
v.)	Case No. 4:25-cv-00195-AGF
)	
UNUM LIFE INSURANCE COMPANY OF)	
AMERICA and WASHINGTON)	
UNIVERSITY MASTER WELFARE)	
BENEFIT PLAN,)	
Defendants.)	

JOINT STIPULATION AND NOTICE OF VOLUNTARY DISMISSAL WITHOUT
PREJUDICE OF DEFENDANT WASHINGTON UNIVERSITY MASTER WELFARE
BENEFIT PLAN ONLY

Pursuant to Fed. R. Civ. P. 41(a)(1), Plaintiff and Defendant Unum Life Insurance Company of America stipulate as follows:

1. This is an action arising under the Employee Retirement Income Security Act of 1974 ("ERISA"), 29 U.S.C. section 1001, *et seq.*
2. Plaintiff has filed the above-captioned action alleging a denial of long-term disability benefits.
3. Plaintiff has named Unum Life Insurance Company of America ("Unum") and Washington University Master Welfare Benefit Plan ("Plan") as Defendants in this action.
4. At all times relevant to the Complaint on file in this action, the benefits are funded through an insurance policy issued by Unum.
5. Unum agrees it will be liable for any judgment or settlement concerning the payment or non-payment of benefits, interest, attorneys' fees and/or costs that may be entered or reached in this action.

6. Unum further agrees that at no time during the course of this litigation will it contend that the action has been rendered defective by the dismissal of the Plan.

7. Unum will remain as the sole defendant in the case.

Accordingly, the parties, Plaintiff and Unum, through their attorneys of record, stipulate to the above and to the dismissal of the Plan only from this case, without prejudice, pursuant to Rule 41(a)(1)(A)(i) of the Federal Rules of Civil Procedure. Each party shall bear its own attorneys' fees and costs directly related to the dismissal of the Plan. Defendant Unum remains a party to this action.

Jointly submitted,

By: s/Christopher J. Leopold

William E. Hanna, MO # 39556
Christopher J. Leopold, MO # 51407
STINSON LLP
1201 Walnut, Suite 2900
Kansas City, MO 64106-2150
816.842.8600 / 816.691.3495 (F)
william.hanna@stinson.com
chris.leopold@stinson.com

ATTORNEYS FOR DEFENDANT
UNUM LIFE INSURANCE COMPANY OF
AMERICA

By: /s/ Talia Ravis

Talia Ravis, KS #22212
Law Office of Talia Ravis, PA
9229 Ward Parkway, Suite 370
Kansas City, MO 64114
816-333-8955 / 800-694-3016 (F)
talialia@erisakc.com

ATTORNEY FOR PLAINTIFF